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7 Attorneys for Lucy Gao (erroneously sued
herein as “Lucy Gao, aka Xiang Xin Gao”)
8 and HK Grace Building LLC

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 JD BROTHERS LLC, a California Limited
13 Liability Company; WEI “WENDY”
HUANG, an individual; and WEI
14 “WENDY” HUANG as TRUSTEE of the
GUO/HUANG FAMILY TRUST, a
15 California trust,

16 Plaintiffs,

17 v.

18 LIBERTY ASSET MANAGEMENT
CORPORATION; BENJAMIN KIRK, aka
19 BENNY KO, aka TZU PING KO; LUCY
GAO, aka XIANG XIN GAO; SUNSHINE
20 VALLEY LLC; HK GRACE BUILDING
LLC; and DOES 1-20,

21 Defendants.
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Case No. 3:15-cv-01373-VC

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND TIME TO
RESPOND TO AMENDED
COMPLAINT**

Judge: Hon. Vince Chhabria
Crtrm.: 4, 17th Floor

RECITALS

WHEREAS, on March 25, 2015, Plaintiff JD Brothers LLC (“JD Brothers”) filed its complaint in this action, in response to which Defendants timely filed motions to dismiss, which were fully briefed and set for hearing on July 17, 2015;

WHEREAS, the law firm of Cotchett, Pitre & McCarthy LLP was retained by JD Brothers after it had filed its opposition to the motions to dismiss and, on June 15, 2015, the firm filed an Association of Counsel and Notices of Appearances for Joseph W. Cotchett and Nancy L. Fineman;

WHEREAS, the parties stipulated and the Court entered an Order on June 26, 2015 to (1) take off calendar the then-pending motions to dismiss, (2) permit JD Brothers to file an amended complaint, and (3) set August 31, 2015 as Defendants’ deadline to respond to the amended complaint;

WHEREAS, JD Brothers filed its amended complaint on July 27, 2015, which added new parties as Plaintiffs and dismissed certain parties as Defendants;

WHEREAS, on August 11, 2015 the Court entered an Order permitting then-counsel for Defendants Benny Ko, Liberty Asset Management Corporation, and Sunshine Valley LLC (the “Ko Defendants”) to withdraw from the action, and such counsel did withdraw;

WHEREAS, the Ko Defendants retained the law firm of Robinson & Wood, Inc., and Jesse F. Ruiz filed a Notice of Appearance as attorney of record in this action for the Ko Defendants on August 13, 2015;

WHEREAS, prior to and during the telephonic case management conference held on August 18, 2015, and in subsequent communications, counsel for the parties agreed in the interests of efficiency and economy to extend Defendants’ deadline to respond to the amended complaint;

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1 Dated: August 27, 2015

2 ROBINSON & WOOD INC.

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4 By /s/ Jesse F. Ruiz
JESSE F. RUIZ

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6 Attorneys for Benny Ko, Liberty Asset
7 Management Corporation, and Sunshine Valley
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PROPOSED ORDER

PURSUANT TO STIPULATION OF THE PARTIES AND GOOD CAUSE

APPEARING:

1. The deadline for all Defendants to respond to Plaintiffs' amended complaint is continued from August 31, 2015 to September 21, 2015;

2. Plaintiffs' opposition to any motion(s) to dismiss the amended complaint must be filed by October 13, 2015;

3. Defendants' reply in support of any motion(s) to dismiss the amended complaint must be filed by October 20, 2015; and

4. The hearing on any motion(s) to dismiss the amended complaint is set for November 19, 2015.

IT IS SO ORDERED.

DATED: August 28, 2015



VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE